

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OHIO, EASTERN DIVISION

DERRICK WHEATT and LAURESE	)	
GLOVER,	)	
	)	No. 1:17-CV-377
Plaintiffs	)	
	)	No. 1:17-CV-611
v.	)	
	)	Judge James S. Gwin
CITY OF EAST CLEVELAND, et al.	)	
	)	Magistrate Judge William
Defendants.	)	H. Baughman, Jr.

AMENDED NOTICE OF RULE 30(b)(6) DEPOSITION

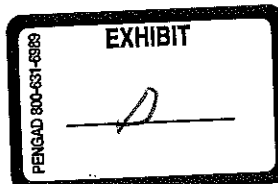
To: Counsel of Record

PLEASE TAKE NOTICE THAT the deposition of Helen Forbes Fields will be taken before a Notary Public in and for the County of Cuyahoga and State of Ohio, on September 28, 2017 at 2:00 p.m. at Cady Reporting Services, Western Reserve Building, 1468 West 9th St., Suite 440, Cleveland, Ohio 44113. To counsel of record for the deponents, this is a demand that you produce the deponents on the date and time listed. This deposition will be stenographically recorded.

Ms. Forbes will be deposed pursuant to Fed. R. Civ. P. 30(b)(6) as the designee of the City of East Cleveland, on the following topics:

- 1) The circumstances that led to Carmen Marino and Deborah Naiman issuing the June 24, 1998 letter to Sergeant Dunn (document Bates-stamped CITY 823);
- 2) City of East Cleveland's ordinances, policies, procedures, rules, guidelines, protocols and practices in effect June 1998 relating to public records requests.
- 3) The person or persons responsible for handling or responding to public records requests in June 1998, including but not limited to requests for files or records from the City of East Cleveland Police Department;

The person or persons responsible for handling the public records request that prompted the June 24, 1998 letter from the Cuyahoga County



Prosecutor's Office to Sergeant Dunn (document Bates-stamped CITY 823);

- 4) Persons with information regarding the circumstances at or around June 1998 regarding the potential release of materials (Bates-stamped CITY 807, 808, 809, 823 and WGA 4005) within the possession of the City of East Cleveland and East Cleveland Police Department regarding the case captioned *State of Ohio vs. Eugene Johnson, et al.*, Cuyahoga County Criminal Case No. 324431 OFI EC 9503123;

All persons who had contact with anyone at Cuyahoga County, including but not limited to contact with Carmen Marino or Deborah Naiman, regarding the June 24, 1998 letter, (document Bates-stamped CITY 823); and whether all or a portion of the materials in the City of East Cleveland, East Cleveland Police Department's possession regarding the case captioned *State of Ohio v. Eugene Johnson, et al.*, Cuyahoga County Criminal Case No.: 324431, OFI EC 9503123, would be released.

Respectfully submitted,

s/ Elizabeth Wang

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#### Certificate of Service

I, Elizabeth Wang, an attorney, hereby certify that on September 18, 2017, I served via e-mail the foregoing Amended Notice of Rule 30(b)(6) Deposition.

s/ Elizabeth Wang

Attorney for Plaintiff